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*Attorneys for Defendant  
MagnaChip Semiconductor Corp.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

RICHARD HAYES, Individually and on Behalf of  
All Other Persons Similarly Situated,

Plaintiff,

v.

MAGNACHIP SEMICONDUCTOR CORP., SANG  
PARK, TAE YOUNG HWANG, and MARGARET  
SAKAI,

Defendants.

CASE NO. 3:14-cv-01160-JST

**STIPULATION AND ~~PROPOSED~~  
ORDER REGARDING DEADLINE  
FOR AMENDED COMPLAINT**

1 WHEREAS, by Order dated May 23, 2014 (Dkt. 18), the Court ordered that “[w]ithin ten  
 2 (10) days after the entry [of] an order appointing lead plaintiff(s) and lead counsel in the above-  
 3 captioned action (or a consolidated action encompassing the above-captioned action) pursuant to  
 4 the PSLRA, the lead plaintiff(s) and Defendants shall confer and propose to the Court dates by  
 5 which lead plaintiff(s) shall either: (a) serve and file an amended or consolidated class action  
 6 complaint that shall serve as the operative complaint in the action and shall supersede any other  
 7 complaints filed in and/or transferred to this Court, or (b) notify counsel for Defendants that the  
 8 original complaint filed in this action shall be the operative complaint in the action.” (May 23,  
 9 2014 Order at 3:17-24.);

10 WHEREAS, by Order dated July 3, 2014 (Dkt. 32), the Court appointed Lead Plaintiff  
 11 Keith Thomas, as well as Lead Counsel and Liaison Counsel in this action;

12 WHEREAS, Lead Counsel and counsel for Defendant MagnaChip Semiconductor Corp.  
 13 (“MagnaChip”) have conferred regarding the date by which Lead Plaintiff shall either serve and  
 14 file an amended complaint, or notify MagnaChip that the original complaint shall be the  
 15 operative complaint in this action;

16 NOW, THEREFORE, it is hereby stipulated and agreed by and among the undersigned  
 17 counsel for Lead Plaintiff and counsel for MagnaChip as follows:

18 1. On or before September 30, 2014, Lead Plaintiff shall either serve and file an  
 19 amended complaint, or notify MagnaChip that the original complaint shall be the operative  
 20 complaint in this action.

21 Dated: July 14, 2014

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25 By: /s/ John C. Tang  
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28 – and –

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18 \* *Admitted pro hac vice*

*Attorneys for Defendant MagnaChip  
Semiconductor Corp.*

13 I, John C. Tang, am the ECF User whose ID and password are being used to file this  
14 STIPULATION AND [PROPOSED] ORDER REGARDING DEADLINE FOR AMENDED  
15 COMPLAINT. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that the signatory below  
16 has concurred in this filing.

17 Dated: July 14, 2014

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19 600 Third Avenue, 20<sup>th</sup> Floor  
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23 By: /s/ Jeremy A. Lieberman  
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28 \* *Admitted pro hac vice*

*Lead Counsel for Lead Plaintiff  
Keith Thomas*

– and –

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*Liaison Counsel for Lead Plaintiff  
Keith Thomas*

**IT IS SO ORDERED.**

Dated: July 16, 2014

